

DATE:

September 16, 1976

TO:

Ken Mensing

FROM:

P. M. McCarthy, Southern Region

SUBJECT:

ST. CLAIR CO. - LPC - 163 121 01 - Sauget/Sauget

The basic purpose of this memo is not to document evidence for legal purposes, but rather to vividly explain by means of photos and observations one of the reasons that our Rules and Regulations call for a minimum of two feet of compacted earth material to be used as final cover.

On September 8, 1976, I observed that the south site of the subject area was smouldering. The fire obviously started at the Northern end where some random dumping has been occurring. About a dozen piles of demolition were also present, and half of them burned or burning. From this point the vegetation began to burn and burned for 360 yards south until it reached some trees and extinguished itself.

However, what is interesting is that from the north end to the south end, nine separate isolated underground fires are burning. Why did the underground fires start in these areas. I offer the following. The proper combination of fuel and ventilation existed at these areas, so that when this surface fire passed over these areas they ignited also. My photos will show many rat holes in the areas of subsurface burning, protruding refuse and between one thich and four inches of cover. The tunnels of the rats provided a path for the fire, a tire which had to descend only one to four inches to reach the refuse. As of mow we have no way of knowing how much of the subsurface is burning.

The attached map and photos will hopefully help explain the situation completely.

This situation should be used as an example of what can occur when we fail to enforce the Regulations. Consider the possibility of what would happen if this closed and not covered site were isolated. It could burn for several weeks underground and get out of control before anyone would report it. Then it would have to be dug up at great expense. It could have all been avoided, by legal action (something less than four years).

PMM:pn

